

November 23, 2005

**VIA ELECTRONIC SUBMISSION**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: E911 Requirements for IP-Enabled Service Providers, WC Docket No.  
05-196

Dear Ms. Dortch,

On November 23, 2005, Jim Kohlenberger, Executive Director, VON Coalition, Glenn Richards, Pillsbury Winthrop Shaw Pittman LLP, counsel for the VON Coalition, and the undersigned had a conference call with Daniel Gonzalez, FCC Chief of Staff, Michelle Carey, Senior Legal Advisor for Chairman Kevin Martin, and Thomas Navin, Chief, Wireline Competition Bureau. During the call, we discussed a number of issues relevant to the upcoming November 28, 2005 compliance deadline for the provision of E9-1-1 for Interconnected VoIP providers.

In addition to describing the substantial progress that VON Coalition members have made in the deployment of E9-1-1 solutions, we described several issues where Commission clarification would facilitate continued progress and more rapid availability of E9-1-1 enabled VoIP services for all Americans. The areas where we asked for clarification and/or Commission action include:

1. Commission establishment of an E9-1-1/P-ANI administrator and recognition of the additional hurdles created by the current lack of an E911/P-ANI administrator.
2. Commission action on the previously submitted VON/NENA petition for clarification of the E9-1-1 Order, including the request that VoIP providers be able to utilize PSTN access to selective routers.
3. Commission recognition of the time necessary to ensure adequate testing prior to the delivery of E9-1-1 services; and

4. Commission recognition of the tension between the recent Public Notice announcing marketing and new customer restrictions and the need for continued investment in 9-1-1 infrastructure in order to facilitate nationwide E9-1-1 availability.

The VON Coalition emphasized that we continue to work with our Interconnected VoIP provider members to ensure that the November 28<sup>th</sup> compliance filings are useful and informative for the Commission.

If you have any questions on VoIP E9-1-1 or related issues, please do not hesitate to contact me.

Sincerely,

/ s/ Staci L. Pies

Staci L. Pies  
VON Coalition, President

cc: Daniel Gonzalez  
Michelle Carey  
Thomas Navin